

**REMARKS**

This is a full and timely response to the outstanding non-final Office Action mailed March 24, 2005 (Paper No. 20050311). Upon entry of this response, claims 1-44 are pending in the application. In this response, claim 22 has been amended to correct a typographical error. Applicants respectfully request that there be reconsideration of all pending claims.

1. **Rejection of Claims 1-4, 7, 9-14, 17, 19-23, 25-26, 29, 31-37, 40, and 44 under 35 U.S.C. §102**

Claims 1-4, 7, 9-14, 17, 19-23, 25-26, 29, 31-37, 40, and 44 have been rejected under §102(b) as allegedly anticipated by *Hosford et al.* (U.S. 5,966,450). Applicants respectfully traverse this rejection. A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. *See, e.g., W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983).

1) **Claims 1, 12, 22, and 35**

Applicants respectfully submit that *Hosford et al.* does not disclose, teach, or suggest the feature of “pseudo-randomly shuffling said sequence number of said first multi-media data flow packet; and transmitting said pseudo-randomly shuffled sequence number to a second endpoint” as recited in claims 1, 12, 22, and 35. The system of *Hosford et al.* uses a frame counter as a seed for a pseudo-random number generator (Col. 4, lines 20-45), and after several intermediate steps (Col. 4, line 45 to Col. 5, line 10), the pseudo-random number is combined with a speech frame to produce an encrypted speech frame. (Col. 5, lines 10-15.) However, the frame counter is not itself “encrypted,” or “shuffled” in a pseudo-random manner. *Hosford et al.* does not even disclose that the frame counter is transmitted, in either in encrypted or plain form. In contrast, Applicants’ invention, as defined by claims 1, 12, 22, and 35, pseudo-randomly shuffles the

sequence number of a multi-media data flow packet, then transmits the shuffled sequence number.

In addition, Applicants submit that *Hosford et al.* does not disclose, teach, or suggest the feature of “unshuffling a pseudo-randomly shuffled sequence number received from said first endpoint, via use of an algorithmic key” as recited in claim 34. *Hosford et al.* does not disclose either receiving a frame counter (in plain or encrypted form), nor unshuffling a received frame counter.

For at least the reason that *Hosford et al.* fails to disclose, teach or suggest the above-recited features, Applicants respectfully request that the rejection of claims 1, 12, 22, and 35 be withdrawn.

b. Claims 2-4, 7, 9-11, 13-14, 17, 19-21, 23, 25-26, 29, 31-34, 36-37, 40, and 44

Since claims 1, 12, 22, and 35 are allowable for at least the reasons discussed above, Applicants respectfully submit that claims 2-4, 7, 9-11, 13-14, 17, 19-21, 23, 25-26, 29, 31-34, 36-37, 40, and 44 are allowable for at least the reason that each depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants respectfully request that the rejection of claims 2-4, 7, 9-11, 13-14, 17, 19-21, 23, 25-26, 29, 31-34, 36-37, 40, and 44 be withdrawn.

2. Rejection of Claims 8, 18, 30, and 41 under 35 U.S.C. §103

Claims 8, 18, 30, and 41 have been rejected under §103(a) as allegedly obvious over *Hosford et al.* (U.S. 5,966,450) in view of *Pickett* (U.S. 2002/0001302). Applicants respectfully traverse this rejection. Since claims 1, 12, 22, and 35 are allowable for at least the reasons discussed above, Applicants respectfully submit that claims 8, 18, 30, and 41 are allowable for at least the reason that each depends from an allowable claim. *In re Fine*, 837 F.2d 1071,

5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants respectfully request that the rejection of claims 8, 18, 30, and 41 be withdrawn.



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## CONCLUSION

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and presently pending claims 1-44 be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

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